

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

THOMAS V. GIRARDI,
CHRISTOPHER K. KAMON, and
DAVID R. LIRA

No. 23 CR 54

Judge Ronald A. Guzman

**MOTION FOR ENTRY OF AGREED
PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d), the United States of America, by MORRIS PASQUAL, Acting United States Attorney for the Northern District of Illinois, moves for the entry of an agreed protective order, and in support thereof states as follows:

1. The indictment in this case charges defendants with wire fraud, in violation of Title 18, United States Code, Section 1343, and criminal contempt of court, in violation of Title 18, United States Code, Section 401(3).

2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect the privacy interests of third parties.

3. The government has discussed the proposed protective order with counsel for each of the defendants, each of whom agrees to the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

MORRIS PASQUAL
Acting United States Attorney

By: /s/ Corey B. Rubenstein
COREY B. RUBENSTEIN
Assistant U.S. Attorney
219 South Dearborn St., Rm. 500
Chicago, Illinois 60604
(312) 353-8880